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BEFORE THE ARIZONA CORPORATION COMMISSION

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IN THE MATTER OF U S WEST
COMMUNICATIONS, INC.'S
COMPLIANCE WITH § 271 OF THE
TELECOMMUNICATIONS ACT OF 1996

Docket No. T-00000A-97-0238

AT&T'S COMMENTS ON
HEWLETT PACKARD'S PRE-
ORDER TO ORDER INTEGRATION
REPORT, VERSION 6

AT&T Communications of the Mountain States, Inc., and TCG Phoenix (collectively "AT&T") hereby file their Comments on Hewlett Packard's Pre-order to Order Integration Report, Version 6 ("HPC Report").

I. INTRODUCTION

Hewlett Packard ("HPC") was engaged by the Commission Staff to conduct analyses of the Qwest EDI Pre-Ordering and Ordering interfaces to provide its evaluation of the integrateability of the interfaces. HPC was to determine whether the interfaces can be integrated by a Qwest competitor and determine whether such integration required manipulation or transformation of the data to achieve integration between the interfaces.

HPC conducted its analysis in two stages: first, on the basis of the Qwest EDI documentation for IMA Release 6 and, second, on the basis of Qwest EDI Release 8.0. The second effort was necessary because Staff acknowledged the validity of competitive local exchange carrier ("CLEC") criticism that the evaluation of Release 6 documentation was of no use due to the expiration of that earlier release.

HPC has provided six (6) versions of its Pre-Order to Order Integration Report to the Commission:

Version 1.0	November 30, 2001
Version 2.0	January 28, 2002
Version 2.0, Suppl. I	February 12, 2002
Version 3.0	March 21, 2002
Version 4.0	March 28, 2002
Version 5.0	April 15, 2002
Version 6.0	July 31, 2002

Versions 1 and 2 deal with the evaluation of the Release 6.0 interfaces, and the later versions deal with the Release 8 interface evaluations.

AT&T previously filed comments with the Commission on the HPC reports. These comments are limited to HPC's correction of a "typographical error" in Version 5.0.

II. HPC CLAIMS VERSION 5.0 OF ITS REPORT CONTAINS A TYPOGRAPHICAL ERROR

The Documentation Control Log provided by HPC in its Report contains a Revision History section that is used to identify the primary purpose for the new version. In its Revision History for Version 6.0, HPC states:

Corrected typographical error on page 34, last paragraph, 3rd sentence to "team that was not experienced." HPC Report at 2.

The change made by HPC is significantly more than a correction of a typographical error because such a change is inconsistent with the balance of the Report and inconsistent with the testimony of HPC witnesses in the workshops held to obtain additional information about the work conducted by HPC and the content of its Report.

In full context the subject sentence before the correction is:

It is HPC's professional opinion, based upon its review of Qwest documentation, that a CSR to LSR parsing would be a very challenging and complex undertaking for a CLEC with an *Information Technology team experienced in EDI development*. Emphasis added.

This statement is provided in Versions 4¹ and 5² of the HPC Pre-Order to Order Integration Report, and Version 5 was the subject of questioning of HPC witnesses by AT&T and WorldCom in the OSS workshops. In the workshops, HPC testified that, based on its evaluation, it concluded that an experienced CLEC Information Technology organization would face challenges in developing the integration of pre-order to order data that HPC envisioned as possible in its documentation analysis:

MR. CONNOLLY: Your opinion is that a CLEC who's going to undertake an integration effort needs to be fairly sophisticated in EDI development or needs to acquire the services or product of a company that's done that work.

MR. NEVILLE: Correct. TR 43 (April 17,2002).

Nothing has transpired in this proceeding that has challenged the testimony of the HPC witnesses that the efforts required to conduct the integration of Qwest pre-order and order interfaces would be a substantial undertaking for a CLEC experienced in EDI development. No additional testing has been conducted, to the best of AT&T's knowledge, that would cause HPC to re-examine the work it did on this engagement that would cause it to alter its previous testimony on this subject.

III. HPC'S CORRECTION DISTORTS THE RECORD

The suggested change to the subject sentence would substantively change the meaning of the conclusion reached by HPC. It now insists that a CLEC *without* substantial EDI experience

¹ HPC Report, Version 4, at 33

² HPC Report, Version 5, at 34

would face difficulties in performing the integration work in contrast to its earlier reports and its testimony that an experienced CLEC would have difficulties in integrating the Qwest interfaces. Do CLECs require experience in EDI development, more specifically Qwest EDI development, to endeavor integrating the interfaces? Unquestionably they do. Would that experience cut short or facilitate the work to program the integration of pre-ordering data into orders? According to the record in this case, the answer is no.

What then is the purpose of the “correction of a typographical error”? It undercuts the CLEC position that Qwest’s interfaces are extremely difficult (if possible at all) to effectively and practically integrate pre-ordering and ordering functions. Qwest and the CLECs differ on this issue, and both parties rely on HPC’s report to support their positions. It is unfair and inappropriate for HPC to unilaterally change a substantive conclusion in its report that overturns its own analysis and sworn testimony and to veil that change as a “correction to a typographical error.”

IV. STAFF ACTION IS REQUIRED


Unfortunately for Staff, HPC’s action places it in a difficult position. The record has been developed such that all parties have their positions before the Staff for its recommendations and the Commission for its decision. Interface integration is a critical part of the OSS issues that are to be decided and the suggestion by HPC that it has a typographical error in its Report bears on the resolution of the issue. Staff should disregard Version 6 of the HPC Report and, since it has not been submitted as part of the workshop process and subject to cross-examination, not allow it to serve as a basis for any recommendations by Staff or the Commission in the future. The record now shows that CLECs with experience in developing EDI interfaces would face

hardships in trying to integrate Qwest's interfaces. This fact should stand unless and until evidence is put in the record that substantiates any change.

Before the Report can be substantively amended, the Staff must provide a workshop venue for the limited purpose of examining the HPC Report, Version 6, and the underlying analysis and evaluations. Parties must be given the opportunity to elicit the facts from HPC's experts as to the necessary experience of CLEC EDI teams that would enable integrated pre-order and order interfaces. AT&T does not believe the workshop would alter the fundamental facts surrounding the Qwest interface integrateability, which are that the interfaces have been designed to make such integration extremely difficult at best, and that the experience level of CLEC EDI Development Teams, no matter how rich, would not facilitate successful integration on a practical basis. Therefore, the simple solution is to reject HPC's changes to the HPC Report, Version 6.

Dated this 19th day of August, 2002.

**AT&T COMMUNICATIONS
OF THE MOUNTAIN STATES, INC.,
AND TCG PHOENIX**

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CERTIFICATE OF SERVICE
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